

O'NEILL / HASSEN

Attorneys at Law

## MEMORANDUM ENDORSED

March 19, 2021

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DOCUMENT  
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DATE FILED: 3/25/21

VIA ECF and Email

Honorable Gregory H. Woods  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: *United States v. Lorry Gonzalez*, 20 Cr. 425 (GHW)

Dear Judge Woods:

I represent Lorry Gonzalez in the above-captioned matter. I am writing to request that the Court modify the conditions of Ms. Gonzalez's bond to remove her ankle bracelet.

Ms. Gonzalez was arrested in this matter on September 2, 2020. At that time, the government wanted to prevent Ms. Gonzalez from returning to her apartment, where the crime occurred. The parties agreed to a bail package that required her to move in with her brother and wear an ankle bracelet with location monitoring.

Since that time, Ms. Gonzalez has relocated to New Jersey – to an apartment in a new community far from the nexus of this crime. Ms. Gonzalez is a single mother raising an autistic nine-year old boy. Her son was born prematurely and suffers from, among other things, a lung disorder. His development is delayed; despite his age, Ms. Gonzalez must still dress him and bathe him. During the COVID-19 pandemic it has been especially hard for her as she is terrified that his health will be adversely impacted if he contracts the disease. Her minor son is on a host of medications to improve his concentration and ensure his health, and one of the side effects is weight gain. During the pandemic, Ms. Gonzalez has tried to make sure that her son gets sufficient exercise, by using a stationary bike along with his school lessons. Despite her best efforts he has gained weight, due to a combination of the medication and decreased physical activity.

Prior to her arrest in this case, Ms. Gonzalez took her son to exercise in a swimming pool. He engaged in aqua therapy that both improved his physical health and served to reduce his distress. Ms. Gonzalez has not been able to take her son to the pool because of her ankle bracelet. She needs to be able to go in the water with him to participate in the therapy and cannot do that with the ankle bracelet attached.

I have spoken with the government and Ms. Gonzalez's probation officer. Both confirm that she has been compliant with the terms of her release. Ms. Gonzalez cannot

Hon. Gregory H. Woods  
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flee and is keenly aware of her precarious situation should she engage in criminal conduct. The government consents to this application for a removal of her ankle bracelet. She will continue to be monitored by probation but will be able to assist her son with his aqua therapy.

I have enclosed a letter from Ms. Gonzalez's son's doctor requesting that he be able to engage in aqua therapy. This letter is redacted to remove the name and date of birth of the minor child.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/

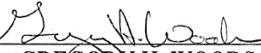
Grainne E. O'Neill  
*Attorney for Lorry Gonzalez*

Application denied. The Court understands that the defendant's ankle bracelet is water proof, and that it would not, therefore, prevent her from engaging in this activity to the extent it is available during the pandemic. If the defendant has additional information to support the need for the modification for this purpose, she may present it to the Court, together with the views of the supervising probation officers.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 32.

SO ORDERED.

Dated: March 25, 2021

  
GREGORY H. WOODS  
United States District Judge

O / H



# Boston Children's Health Physicians

Until every child is well™

40 Saw Mill River Road Hawthorne NY, 10532-2115  
Phone: (914)768-3970 Fax: (914)768-3969

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PATIENT:

DATE OF BIRTH:

03/09/2021

To Whom It May Concern,

is a patient of ours that is being treated for Autistic Disorder and Attention Deficit Disorder. Patients with these diagnoses benefit tremendously with exercise and physical therapy, with aqua therapy being ideal for this particular patient. Due to the confines caused by COVID-19, it has become imperative for the well-being of children, especially those with special needs, to return to physical activity. Aqua therapy would be a great way for C to get exercise, to improve muscle strength and enhance his focus on something positive.

If there is anything that we can do to expedite this, please contact this office.

Sincerely,

**Steven Wolf, MD**  
**NYSL# 183592**  
**NPI# 1487645693**